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August 26, 2013

VIA U.S. MAIL and E-MAIL

Theodore Hadley
Chilton Yambert & Porter LLP
150 South Wacker Drive, Suite 2400
Chicago, IL 60606

Paul R Bartolacci
Kevin John Hughes
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103

Re: Great Northern Ins. Co. v. Cellar Advisors, LLC v. Sataria Acquisition LLC
N.D. Illinois Case No. 2012 CV 9343

Gentlemen:

This letter and the enclosed Notices of Deposition confirm what we discussed on the telephone conference this morning with counsel for Great Northern Insurance Company. Please review the notices to confirm that the witnesses identified will be available for deposition on the appointed dates and times. If we need to adjust the times, please let us know as soon as possible so that we can make the proper arrangements.

In addition to hopefully setting depositions of representatives of Cellar Advisors, LLC, we also discussed setting the deposition schedule for the rest of the case, subject to adjustment depending on the content of the testimony and availability of third party witnesses. To confirm, we have tentatively agreed to schedule depositions of Mr. Stewart, Mr. Olson and, possibly, Mr. Searle, in the Chicago area on October 22 and 23. Mr. Bartolacci will report back as to whether Mr. Searle will be deposed in Chicago or in Southwest Florida. Additionally, we have agreed to schedule depositions of the four current and former employees of Flagship between November 19, 2013 and November 21, 2013, in Indianapolis. We also agreed to schedule depositions of Allan Zubar, representative(s) of Florida Freezer and a representative of Fairway Wine Storage in Southwest Florida on December 3 and 4. Finally, we discussed setting depositions of Mary Mullen and Charese Pagliaro by telephone, pending Ms. Mullen's availability during her maternity leave.

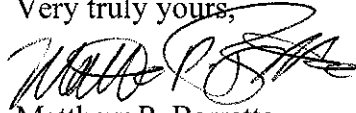
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Counsel
August 28, 2013
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Mr. Hadley, please confirm your availability for the above-referenced dates or propose alternative dates if you are not available. Additionally, please advise as to the specific date that your client will provide the overdue written responses to Flagship Logistics Group's written discovery requests.

Please let me know if I have left anything out of this letter or have misstated our discussion in any way.

Very truly yours,



Matthew P. Barrette

MPB/sf
Encl.